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Attorneys for Defendants Oregon Department of Corrections and Brandon Kelly

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

Carlton Eugene Hayes,

Plaintiff,

v.

Oregon Department of Corrections, Brandon
Kelly - Oregon State Penitentiary- et al,

Defendants.

Case No. 6:18-CV-2006-MC

OFFER OF JUDGMENT

TO: Carlton Hayes, by and through his attorneys Kevin T. Lafky & Tonyia J. Brady,
Lafky & Lafky, 429 Court Street NE, Salem, OR 97301

Pursuant to Fed. R. Civ. P. 68, Defendants the Oregon Department of Corrections
("ODOC") and Brandon Kelly hereby offer to settle this matter and allow entry of judgment in
favor of Plaintiff and against them in the sum of Two Hundred and Fifty-One Dollars (\$251.00),
plus reasonable, legally recoverable attorney fees and costs incurred by Plaintiff through the date

of service of this Offer of Judgment. Plaintiff's attorney fees and costs shall be determined pursuant to Fed. R. Civ. P. 54, LR 54-1, LR 54-3, or other applicable Federal Rule.

This offer is not to be construed as an admission for any purpose. Pursuant to Fed. R. Civ. P. 68, if this offer is not accepted on or before the close of business within fourteen (14) days after being served, it shall be deemed to be revoked.

DATED January 28, 2019.

Respectfully submitted,

ELLEN F. ROSENBLUM
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s/ Jessica Spooner
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Plaintiff [ACCEPTS X / DECLINES] Defendants' Offer of Judgment

 OSB #103491
For: KEVIN T. LAFKY OSB #852633
Of Attorneys for Plaintiff

DATED: 2/8/19